UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JASON EDWARD MILLER and : CHAPTER 13

DEBRA MARIE MILLER

Debtors

:

JACK N. ZAHAROPOULOS

STANDING CHAPTER 13 TRUSTEE

Movant

:

VS.

:

JASON EDWARD MILLER and

DEBRA MARIE MILLER

Respondents : CASE NO. 1-24-bk-01939

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 10th day of October, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

- 1. Trustee avers that debtor(s)' plan cannot be administered due to the lack of the following:
 - a. Need credit report.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036

(717) 566-6097

BY: /s/Douglas R. Roeder

Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 15th day of October, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Brent Diefenderfer, Esquire 135 North George Street York, PA 17401

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee